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Chimei Innolux Corporation (f/k/a Chi Mei
Optoelectronics Corp.), Chi Mei Optoelectronics
USA, Inc., and CMO Japan Co., Ltd.

**UNITED STATES DISTRICT COURT
 FOR THE NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO DIVISION**

IN RE: TFT-LCD (FLAT PANEL)
 ANTITRUST LITIGATION

CASE NO. 3:11-cv-711

MDL NO. 3:07-md-1827-SI

This Document Relates to Individual
 Case No. 3:11-cv-711

STATE OF NEW YORK, by and through
 ERIC T. SCHNEIDERMAN, Attorney
 General,

**STIPULATION AND ~~PROPOSED~~
 ORDER REGARDING TIME TO
 RESPOND TO AMENDED COMPLAINT**

Plaintiffs,

v.

AU OPTRONICS CORPORATION, *et al.*,

Defendants.

1 The undersigned counsel, on behalf of their respective clients, hereby respectfully request
2 an extension of the deadline for Defendants Chimei Innolux Corporation (f/k/a Chi Mei
3 Optoelectronics Corporation), Chi Mei Optoelectronics USA, Inc., and CMO Japan Co., Ltd.
4 (collectively, the "Chi Mei Defendants"), and Defendants Hitachi, Ltd., Hitachi Displays, Ltd., and
5 Hitachi Electronic Devices (USA), Inc. (collectively, the "Hitachi Defendants"), to respond to the
6 amended complaint filed by Plaintiff State of New York on March 15, 2011, in the above-captioned
7 litigation (the "Amended Complaint").

8 WHEREAS the Chi Mei Defendants and Hitachi Defendants, jointly with other Defendants
9 in this action, filed a motion to dismiss the amended complaint on May 5, 2011;

10 WHEREAS the Court entered an order granting in part and denying in part Defendants'
11 joint motion to dismiss the Amended Complaint on August 9, 2011;

12 WHEREAS on August 25, 2011, the Court entered an order extending Defendants' deadline
13 to answer the Amended Complaint until September 14, 2011;

14 WHEREAS Plaintiff State of New York and the Chi Mei Defendants and Hitachi
15 Defendants have agreed to a settlement in principle of the above-captioned litigation subject to
16 board approval;

17 WHEREAS the parties would benefit from additional time to continue to negotiate the
18 terms of that settlement;

19 WHEREAS further extending the time for the Chi Mei Defendants and Hitachi Defendants
20 to answer the Amended Complaint would not alter the date of any other event or deadline already
21 fixed by the Court;

22 THEREFORE, Plaintiff State of New York and the Chi Mei Defendants and Hitachi
23 Defendants, by their respective counsel, stipulate and agree as follows:

24 The Chi Mei Defendants and Hitachi Defendants will have until October 25, 2011
25 to answer the Amended Complaint.
26
27
28

1 Dated: September 13, 2011

Respectfully submitted,

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3 ERIC T. SCHNEIDERMAN
Attorney General of the State of New York

4
5 By: /s/ Richard L. Schwartz
6 Richard L. Schwartz

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13 *Attorneys for Plaintiff State of New York*

14 * Automatic *Pro Hac Vice* Admission Pursuant to
15 Pretrial Order No. 1, Dated July 3, 2007 (Waiving
16 Civil L.R. 11-3)

17 DAVIS POLK & WARDWELL LLP

18
19 By: /s/ Sandra West
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27 *Corporation (f/k/a Chi Mei Optoelectronics Corp.),*
Chi Mei Optoelectronics USA, Inc., and CMO Japan
28 *Co., Ltd.*

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(USA), Inc.*

1 Pursuant to General Order 45, Part X-B, the filer attests that concurrence in the filing of this
2 document has been obtained from all parties whose signatures are indicated by a "confirmed"
3 signature (/s/) within this e-filed document.

4
5 Dated: September 13, 2011


Sandra West (SBN 250389)

[PROPOSED] ORDER

Having considered the foregoing stipulation, and for good cause appearing,
IT IS SO ORDERED.

Dated: 9/13, 2011



The Honorable Susan Illston
United States District Judge